Docket No.: CERO-002

MAY 0 2 2005

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

roup Art Unit: 2673

Examiner: Vijay Shankar

Serial No.: 10/646,614

Filed: August 21, 2003

In re Application of: Lubarsky Jr. et al.

For: METHOD AND APPARATUS OF POSITION LOCATION

Certificate of Mailing

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail, in an envelope addressed to Mail Stop Issue Fee, Commissioner for Patents, Plos Box/1450, Alexandria, VA 22313-1450 on 4005.

Stephanie Davis

APPLICANT'S COMMENTS ON REASONS FOR ALLOWANCE

Mail Stop Issue Fee Commissioner for Patents P.O. Box 1450 Alexandria VA 22313-1450

Dear Sir:

These comments are responsive to the Notice of Allowance mailed on March 29, 2005, which sets forth the Examiner's statement of reasons for allowance.

The Examiner is thanked for the kind allowance of all pending claims. Applicants acknowledge the Examiner's statement of reasons for allowance as set forth in the Notice of Allowance. However, Applicants point out that the reasons for allowablity of the above referenced claims are not limited to the reasons for allowance as set forth in the Notice of Allowance, and that additional reasons for allowablity may exist, each of which

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may be independently sufficient to establish the patentability of one or more pending claims.

Applicants respectfully reserve the right to introduce, articulate, or otherwise comment on any such additional reasons for allowance as may be appropriate in any future proceedings concerning the claimed invention.

Please charge any additional required fee or credit any overpayment to our deposit account number 50-0612.

Respectfully submitted,

SIERRA PATENT GROUP, LTD.

Dated: April 28, 2005

William P. Wilbar Reg. No. 43,265

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